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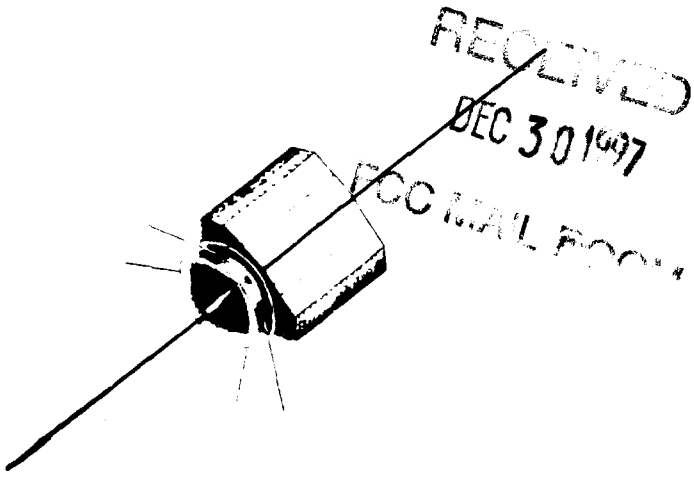

Satellite Communications Co.

5431 W. Center St. *Milwaukee, Wisconsin 53210*

Phone: 414-445-2300

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

December 27, 1997

Dear Sir:

Please forward our enclosed comments on ET Docket 97-214 to the appropriate bureau.

Yours truly,

John C. Aegerter,
President

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Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of Amendment of Part 2 of the Commission's Rules to allocate the 455-456 MHz. and 459-460 MHz. bands to the Mobile-Satellite Service.	))))	ET Docket 97-214

December 27, 1997

Comments from John C. Aegerter, licensee of Station KNKC-937.

I have read the Notice of Proposed Rule Making released October 14, 1997 and would oppose allocating the 459-460 MHz. mobile band to this Mobile Satellite Service (Earth to Space) for the following reasons:

1. Part 22 licensees will loose flexibility previously gained in the use of this 459-460 MHz. mobile band for terrestrial links and control unit operations under the recent enactment of Section 22.567(h). This is to say nothing about interference to CMRS licensees operating mobile systems on these frequency pairs. Section 22.573 and 22.575 of the Rules will be compromised. In addition, splitting this Part 22 mobile band to coordination under Resolution 46 of the ITU regulations will further upset the operations of CMRS providers in this band. Further, granting "primary" operation in this small 0.625 MHz. (459.650-459.025 MHz.) band will achieve little and destroy the continuitity of this Public Mobile band. Being such a small allocation (0.625 MHz.) it is hardly worth tampering with. Emerging technologies such as two-way paging, mobile data, will require a "mobile only" channel and it is already here in this service. The question is, why destroy it?

2. Sufficient allocated spectrum already exists at 148-149.9 MHz. and 399-400.05 MHz. on a primary basis and <u>it has not been determined to date if this is an in-sufficient amount for spectrum for the service.</u> The total amounts to 2.95 MHz. of spectrum, nearly 5 times the amount at 459-460 MHz.!

3. In Region 2 additional spectrum at 608-614 MHz. (Television Channel 37) has for many years been allocated by the World Administrative Radio Conference for Radio Astronomy, Mobile-Satellite, except aeronautical mobile satellite, (Earth to Space). Presently a silent zone on this channel exists across the United States. There are no transmissions in this band due to intense lobbying by two universities for radio research telescopes to monitor outer space in this band. I believe that in the vast 6 MHz. bandwidth of this unused television channel there would be room for a meager 0.625 MHz. (at minumum) allocation for Little LEO ground transmitters. Rules could be written to prohibit operation within 300 kilometers of either Ohio State or Stanford Universities radio telescopes. Directional antennas should be mandated to further reduce terrestrial interference to the radio telescopes or adjacent television channels 36 or 38. A gap in a television channel spectrum is nothing new and presently exists between television channels 4 and 5. Technically speaking, I favor an allocation for Little LEO in the center of TV channel 37 probably around 611 MHz..

4. For these reasons it is easy to see why the United States failed to secure additional spectrum below 1000 MHz. at the WRC 95 conference. A 6 MHz. television channel (Channel 37) sitting there vacant, plus 2.95 MHz. already allocated appears to be plenty for the proposed use in the immediate future.

5. There are other vast spectrum bands with litle use presently not allocated in Region 2 for Earth to Space Mobile Satellite. Hopefully with the study to be presented to the WRC 99 conference by our United States delegation addressing the interference potential for global data satellite systems causing interference to terrestrial fixed and mobile wireless licensees, we will know more before tampering with the popular Public Mobile Services frequency allocations.

Respectfully submitted,

John C. Aegerter
December 27, 1997